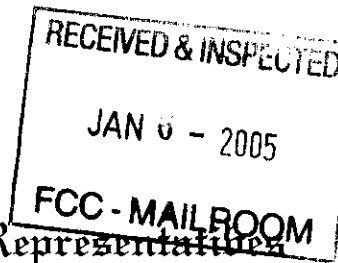


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DISTRICT 24



COMMITTEES:
TRANSPORTATION
FEDERAL MANDATES AND
PROPERTY RIGHTS
RULES

Arizona House of Representatives
Phoenix, Arizona 85007

December 14, 2004

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Re: MB Docket No. 04-312 (Channel *39, Phoenix, Arizona, and Channel 11, Holbrook, Arizona)

Dear Ms. Dortch:

I am writing on behalf of the undersigned organization, NBC/Telemundo AZ, to support the pending proposal of NBC Telemundo License Co. (NBC Telemundo) and Community Television Educators, Inc. (CTE) to transfer the reserved designation (*) currently assigned to Channel *39 to Channel 11 in Holbrook and to authorize NBC Telemundo to operate on Channel 39 and CTE to operate on Channel *11. For the reasons outlined in this letter, our organization strongly supports the proposal and urges the FCC to grant it promptly so that the large Hispanic population of Phoenix can have, for the first time, a choice of full-power Spanish language television stations.

The Hispanic Residents of the Phoenix Area Lack Choice in Full-Power Spanish-Language Television Programming

- According to the 2000 U.S. Census, Phoenix is the sixth-largest Hispanic center of population in the United States. Thirty-four percent of the population of Phoenix and 26.7 percent of the population of Maricopa County are Hispanic. Many of these Hispanic residents are recent immigrants who speak only or primarily Spanish in their homes.
- Only about 40 percent of the Spanish-dominant residents of Phoenix subscribe to cable and other pay television services. This means that well more than half of these predominantly Spanish-speaking viewers rely on free, over-the-air television as their primary source of news and information.
- Currently, Phoenix and the surrounding area are served by only one full-power Spanish-language television station, KTVW-TV, which is owned by Univision, while Telemundo's programming is carried on a low power Class A station, KDRX. This means that Phoenix is the only one of the top ten Hispanic television markets in the U.S. that does not have a full-power competitor to Univision. Univision also owns a second full-power station in the Phoenix television market, but that station is licensed to Flagstaff, and its signal does not reach Phoenix.

Telemundo's Class A Station Is Not an Adequate Substitute for a Full-Power Station

- Many Spanish-speaking residents of Phoenix who do not have cable or satellite service tend to rely more heavily on indoor antennas for their television reception.
- Low power stations do not provide an adequate signal for reception by indoor antennas. This poor reception discourages Hispanic viewers from watching Telemundo's Class A station.

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- Even for those Hispanic viewers who do subscribe to cable, Telemundo's Class A station is at a disadvantage as compared to a full-power station because Cox, the largest cable operator in the area, carries Telemundo programming on an expanded basic tier that is much more expensive than the basic tier on which Univision's station is carried.

Granting the Proposal Will Create Better Programming Choices for Phoenix's Hispanic Residents, Including Expanded Spanish-Language News Coverage

- Phoenix's Hispanic residents need and deserve a choice in full-power over-the-air Spanish-language television stations so that they have access to diverse programming of all types. Granting the proposal will give them that choice for the first time.
- We understand that NBC Telemundo has pledged to air one hour of locally produced Spanish-language news programming Monday through Friday to its broadcast schedule if the proposal is granted.
- The vast majority of Spanish-dominant viewers in Phoenix rely on television as their primary source of news and information. Having a choice in locally produced Spanish-language news programming is especially important to these viewers.

For all of the foregoing reasons, we urge the FCC to act quickly to grant the proposal submitted by NBC Telemundo and CTE. Phoenix's Hispanic population need and deserve the choice in Spanish-language programming that the proposal will bring.

Respectfully submitted,



Representative Amanda Aguirre
District 24